

EXHIBIT "A"

BER-L-009062-18 12/19/2018 1:01:17 PM Pg 1 of 5 Trans ID: LCV20182198837

BRANDON J. BRODERICK, ESQ
ATTORNEY I.D.# 009462006
BRANDON J. BRODERICK, LLC
65 EAST ROUTE 4, FIRST FLOOR
RIVER EDGE, NEW JERSEY 07661
Attorney for Plaintiff(s)
201-853-1505

DAVID R. COLLADO,
Plaintiff(s),

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

v.

DOCKET NO. BER-L-

GURJIT S. DHILLON, NB TRANS
INC., SANDEEP KAUR DHILLON,
BEAZLEY GROUP, JOHN DOE 1-10
(fictitiously named),
and ABC Co. 1-10 (fictitiously
named)

CIVIL ACTION

Defendant(s)

COMPLAINT
and
JURY DEMAND

The Plaintiff, David R. Collado, residing at 45 Avenue E, in
the Borough of Lodi, Bergen County, New Jersey, by way of Complaint
against the Defendants, says:

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FIRST COUNT

1. On or about the 19th day of April, 2017, the Plaintiff, David R. Collado, was injured in a motor vehicle accident traveling on East Union Avenue at or near the intersection of Murryhill Parkway, in the Borough of East Rutherford, Bergen County, New Jersey.

2. At the above time and place, the Defendant, Gurjit S. Dhillon, residing at 2456 Baseline Road, Grand Island, New York, was operating a motor vehicle with the permission and consent, expressed or implied or in capacity as agent, servant or employee of the owner Defendants, NB Trans Inc., Sandeep Kaur Dhillon and/or Beazley Group, located at 10780 Pelican Avenue, Stockton, California, traveling on East Union Avenue at or near the intersection of Murryhill Parkway, in the Borough of East Rutherford, Bergen County, New Jersey.

3. At the above time and place, the Defendants so carelessly, negligently and recklessly operated, maintained and/or repaired said vehicle so as to cause a collision with Plaintiff.

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4. At the same time and place, the Defendants, John Doe 1-10 (fictitiously named) and ABC Co. 1-10 (fictitiously named), their agents or assigns so carelessly, negligently and recklessly operated, owned, maintained and/or repaired said vehicle so as to cause the within collision.

5. As a direct and proximate result of the foregoing, the Plaintiff, David R. Collado, was caused to sustain serious and permanent injuries, as more particularly defined and set forth in N.J.S.A. 39:6A-8(a) and has suffered great pain, shock, and mental anguish and was, and still is, incapacitated and will be permanently disabled, and has in the past and will in the future be caused to expend substantial sums of money for medical treatment.

WHEREFORE, the Plaintiff, David R. Collado, demands judgment for damages against the Defendants, jointly and severally, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats and reiterates each and every allegation contained in the First Count of the Complaint as if the same were fully set forth herein at length.

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2. Defendants, NB Trans Inc., Sandeep Kaur Dhillon, Beazley Group, and/or, John Doe 1-10 (fictitiously named) and/or ABC Co. 1-10 (fictitiously named) were obligated to hire, train, employ, supervise and manage its employees and/or drivers. Defendants negligently hired, trained, supervised and managed its employees and/or drivers, which negligence caused Plaintiff to sustain permanent and severe injuries.

WHEREFORE, Plaintiff, David R. Collado, demands judgment, jointly and severally against Defendants for compensatory damages, interest, attorney's fees and costs of suits.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R.4:25-4, the Court is advised that Brandon J. Broderick, is hereby designated as trial counsel.

JURY DEMAND


Plaintiff hereby demands a Trial by jury as to all issues herein.

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CERTIFICATION PURSUANT TO RULE 4:5-1

Pursuant to Rule 4:5-1, the undersigned certifies that the matter in controversy is not the subject of any other action in any Court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

BRANDON J. BRODERICK, LLC

A handwritten signature in black ink, appearing to read 'Brandon J. Broderick', is written over a horizontal line.

Brandon J. Broderick, Esq.
Attorney for Plaintiff

Dated: December 12, 2018

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Civil Case Information Statement

Case Details: BERGEN | Civil Part Docket# L-009062-18

Case Caption: COLLADO DAVID VS DHILLON GURJIT

Case Initiation Date: 12/19/2018

Attorney Name: BRANDON JAMES BRODERICK

Firm Name: BRANDON J. BRODERICK, ESQ. LLC

Address: 65 EAST ROUTE 4 1ST FL

RIVER EDGE NJ 07661

Phone:

Name of Party: PLAINTIFF : Collado, David, R

Name of Defendant's Primary Insurance Company

(if known): New Jersey Manufacturers Insurance Group

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

12/19/2018

Dated

/s/ BRANDON JAMES BRODERICK

Signed

NJ SUPERIOR COURT LAWYER REFERRAL AND LEGAL SERVICE LIST

ATLANTIC COUNTY:
Deputy Clerk, Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., 1st Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:
Deputy Clerk, Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2156

BURLINGTON COUNTY:
Deputy Clerk, Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:
Deputy Clerk, Superior Court
Civil Processing Office
Hall of Justice
1st Fl, Suite 150
101 South 5th Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:
Deputy Clerk, Superior Court
9 N. Main Street
Cape May Court House, NJ
08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:
Deputy Clerk, Superior Court
Civil Case Management Office
60 West Broad Street
P. O. Box 10
Bridgeport, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY:
Deputy Clerk, Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr.
Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:
Deputy Clerk, Superior Court
Civil Case Management Office,
Attn: Intake, First Fl., Court
House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:
Deputy Clerk, Superior Court
Civil Records Dept.
Brennan Court House, 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:
Deputy Clerk, Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:
Deputy Clerk, Superior Court
Local Filing Office, Courthouse
175 S. Broad Street
P. O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk, Superior Court
Middlesex Vicinage
Second Floor, Tower
56 Paterson Street
P. O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 878-0053
LEGAL SERVICES
(732) 749-7600

MONMOUTH COUNTY:
Deputy Clerk, Superior Court
Court House
P. O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 666-0020

MORRIS COUNTY:
Morris County Courthouse
Civil Division
Washington & Court Streets
P. O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk, Superior Court
Court House, Room 121
118 Washington Street
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk, Superior Court
Civil Division - Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:
Deputy Clerk, Superior Court
Attn: Civil Case Management
Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

SOMERSET COUNTY:
Deputy Clerk, Superior Court
Civil Division Office
40 North Bridge Street
P. O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 731-0840

SUSSEX COUNTY:
Deputy Clerk, Superior
Court
Sussex County Judicial
Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:
Deputy Clerk, Superior
Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-
6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:
Deputy Clerk, Superior
Court
Civil Division, Court
House
413 Second Street
Belvidere, NJ 07823-
1500
LAWYER REFERRAL
(908) 659-4300
LEGAL SERVICES
(908) 475-2010